

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

**EQUAL EMPLOYMENT OPPORTUNITY §
COMMISSION, §**

Plaintiff, §

v. §

VIBRALIFE OF KATY, LLC, §

Defendant. §

Civ. Action No. 4:24-CV-02861

NOTICE OF SETTLEMENT

Plaintiff EQUAL EMPLOYMENT OPPORTUNITY COMMISSION and Defendant VIBRALIFE OF KATY, LLC (collectively, “Parties”), hereby file this Notice of Settlement and would respectfully show the Court as follows:

1. The Parties have agreed to resolve the dispute that forms the basis of this lawsuit and the Parties have reached a settlement of this lawsuit.

2. The Parties are in the process of fully consummating a Consent Decree and Release of claims and within 30 days expect to dismiss this case with prejudice with each party to bear its own costs and attorney’s fees.

Date: October 21, 2024

Respectfully submitted,

**EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION**

/s/ N. Joseph Unruh*

N. Joseph Unruh

Texas Bar No. 24075198

SDTX No. 1571957

Houston District Office

GORDON REES SCULLY MANSUKHANI, LLP

/s/ Nellie Gomez

Laura E. De Santos, ATTORNEY-IN-CHARGE

Texas Bar No. 00793612

SDTX No. 19328

ldesantos@grsm.com

Nellie Gomez

Mickey Leland Federal Building
1919 Smith Street, 7th Floor
Houston, Texas 77002
Telephone: (346) 327-7703
Facsimile: (713) 651-7995
Email: neil.unruh@eeoc.gov
*Signed with Permission

ATTORNEY FOR PLAINTIFF

Texas Bar No. 00798211
SDTX No. 21164
ngomez@grsm.com
1900 West Loop South, Suite 1000
Houston, Texas 77027
Telephone: (713) 961-3366
Facsimile: (713) 961-3938

ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on October 21, 2024, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

N. Joseph Unruh
EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
Houston District Office
Mickey Leland Federal Building
1919 Smith Street, 7th Floor
Houston, Texas 77002
Telephone: (346) 327-7703
Facsimile: (713) 651-7995
Email: neil.unruh@eeoc.gov

ATTORNEY FOR PLAINTIFF

/s/ Nellie Gomez

Nellie Gomez